

BRENT M. RESH  
(Nevada Bar No. 14940)  
BRENT RESH LAW, PLLC  
2401 La Solana Way  
Las Vegas, NV 89102  
(702) 781-6903  
brent@brentreshlaw.com

JESSICA L. BLOME  
(Cal. Bar No. 314898, admitted pro hac vice)  
J. RAE LOVKO  
(Cal. Bar No. 208855, admitted pro hac vice)  
GREENFIRE LAW, PC  
2748 Adeline Street, Suite A  
Berkeley, CA 94703  
(510) 900-9502  
jblome@greenfirelaw.com  
rlovko@greenfirelaw.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Wild Horse Education, a non-profit  
corporation,

Plaintiffs,

v.

United States Department of Interior, Bureau  
of Land Management,

Defendant.

Case No. 3:25-cv-00152-MMD-CSD

**Stipulation and Order to Extend Time to  
Oppose Federal Defendant's Motion to  
Dismiss**

**(First Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Wild Horse Education, and Federal Defendant United States Department of Interior, Bureau of Land Management, through undersigned counsel, hereby stipulate and agree as follows:

Federal Defendant filed a Motion to Dismiss on June 12, 2025. ECF No. 14.

The current deadline for Plaintiff to respond to Federal Defendant's Motion to Dismiss is June 26, 2025.

On June 24, 2025, undersigned counsel for Plaintiff and Federal Defendant agreed to a two-week extension of time to allow the parties to meet and confer regarding the motion. The standard for extending time is good cause. *See* FRCP 6(b)(1)(A).

Accordingly, the parties, through undersigned counsel, submit this stipulation to a two-week extension from June 26, 2025, to and including **July 10, 2025**, for Plaintiff to file an opposition to Federal Defendant's Motion to Dismiss. This is Plaintiff's first request for an extension of time.

This stipulated request is filed in good faith and not for the purposes of undue delay.

Respectfully submitted this 25th day of June, 2025.

BRENT M. RESH  
Nevada Bar No. 14940  
Brent Resh Law, PLLC  
2401 La Solana Way  
Las Vegas, Nevada 89102  
brent@brentreshlaw.com

/s/ J. Rae Lovko  
JESSICA L. BLOME  
J. RAE LOVKO  
Greenfire Law, PC  
2748 Adeline Street, Suite A  
Berkeley, CA 94703  
jblome@greenfirelaw.com  
rlovko@greenfirelaw.com

*Attorneys for the Plaintiff*

SIGAL CHATTAH  
United States Attorney

/s/ Karissa D. Neff  
KARISSA D. NEFF  
Assistant United States Attorney

*Attorneys for the Federal Defendant*

**IT IS SO ORDERED:**

**UNITED STATES MAGISTRATE JUDGE**

**DATED:**